

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TAEMY OH and YONG K. OH,)	
)	
Plaintiffs)	Case No. 1:18-cv-07214
)	
vs.)	
)	Honorable Sharon Johnson Coleman
PHH MORTGAGE CORPORATION, successor)	
by merger to Ocwen Loan Servicing, LLC,)	
)	
Defendant.)	

**PHH MORTGAGE CORPORATION’S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant PHH Mortgage Corporation, successor by merger to Ocwen Loan Servicing, LLC (“Defendant”), respectfully requests this Court enter an order extending the time for it to respond to the Second Amended Complaint (“SAC”) filed by Plaintiffs Taemy Oh and Yong K. Oh (Dkt. No. 70) to June 3, 2021 and, in support thereof, states as follows:

1. Plaintiffs filed the SAC on April 22, 2021. (Dkt. No. 70.) By rule, Defendant’s response is due May 6, 2021. *See* Fed. R. Civ. P. 15(a)(3).
2. Defendant seeks more time to complete its review of the allegations in the SAC and prepare its response. Specifically, Plaintiffs now allege new and different facts in support of their FDCPA claim in order to cure the deficiencies identified in Defendant’s prior motion to dismiss. Defendant requests time to investigate these allegations and decide whether to again move against the FDCPA claim, or file an answer.
3. Counsel for Plaintiffs has agreed to the requested extension. This motion is made in the interests of judicial economy and not for the purposes of delay. No party will be prejudiced by this extension.

WHEREFORE, PHH Mortgage Corporation respectfully requests entry of an order extending its time to answer, move, or otherwise plead in response to the complaint up to and including June 3, 2021, and granting such other and further relief as the Court finds just and necessary.

DATED: May 4, 2021

PHH MORTGAGE CORPORATION,

By: /s/ Michael P. McGivney
One of its attorneys

Simon Fleischman (6274929)
sfleischmann@lockelord.com
Irina Dashevsky (6298331)
irina.dashevsky@lockelord.com
Michael P. McGivney (6324324)
michael.mcgivney@lockelord.com
Locke Lord LLP
111 South Wacker Drive
Chicago, Illinois 60606
Phone: 312-443-0700

CERTIFICATE OF SERVICE

I, Michael P. McGivney, an attorney, certify that I caused the foregoing to be served upon all persons and entities authorized and registered to receive such service through the Court's Case Management/Electronic Case Files (CM/ECF) system on May 4, 2021.

/s/Michael P. McGivney